

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO, ET  
AL.,

Defendants.

No. 12-cv-2039 (GAG)

**JOINT MOTION SUBMITTING PROPOSED ORDER**

COME NOW, Plaintiff, the United States of America, and Defendants, the Government of Puerto Rico, et al., (collectively, the Parties), with the concurrence of the Technical Compliance Advisor (TCA), and respectfully submit the attached proposed order regarding personnel changes that implicate the Agreement for the Sustainable Reform of the Puerto Rico Police Department (Dkt. 60).

The attached proposed order supplements this Court's Amended Order of July 2, 2014 (Dkt. 143) and addresses the concerns expressed by the TCA and the United States during the November 16, 2017 status conference. The Parties each considered the proposed order and conferred with the TCA to reach agreement on its joint submission to the Court for its consideration.

WHEREFORE, the Parties respectfully submit the attached proposed order for the Court's consideration.

Respectfully submitted, this 17th day of November, 2017,

FOR PLAINTIFF:

**JOHN M. GORE**

Acting Assistant Attorney General  
Civil Rights Division

**STEVEN H. ROSENBAUM**

Chief, Special Litigation Section

s/ Luis E. Saucedo

**TIMOTHY D. MYGATT**

Deputy Chief

**LUIS E. SAUCEDO** (G01613)

Counselor to the Chief

**BRIAN BUEHLER**

**LYNDA GARCIA**

Trial Attorney

U.S. Department of Justice

Civil Rights Division

Special Litigation Section

950 Pennsylvania Avenue, NW

Washington, DC 20530

Tel: (202) 598-0482

Fax: (202) 514-4883

luis.e.saucedo@usdoj.gov

Attorneys for Plaintiff

FOR DEFENDANTS:

**WANDA VAZQUEZ GARCED**

Secretary of Justice

**WANDYMAR BURGOS VARGAS**

Deputy in Charge of

General Litigation

**SUSANA PENAGARICANO BROWN**

Director Federal Litigation and Bankruptcy

s/ Joel Torres Ortiz

**Joel Torres Ortiz**

U.S.D.C. NO. 302311

Federal Litigation Division

Department of Justice

P.O. Box 9020192

San Juan, P.R., 00902-0192

Tel. (787) 721-2900, ext.2647,2650,2624

Fax (787) 723-9188

joeltorres@justicia.pr.gov

Attorneys for Defendants

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 17, 2017, a copy of the foregoing Joint Motion In Compliance was filed electronically with the Clerk of Court using the CM/ECF System, which will provide notice of such filing to all registered parties.

s/Luis E. Saucedo

**LUIS E. SAUCEDO** (G01613)

Counselor to the Chief

U.S. Department of Justice

Civil Rights Division

Special Litigation Section

950 Pennsylvania Avenue, NW

Washington, DC 20530

Tel: (202) 598-0482

Fax: (202) 514-4883

luis.e.saucedo@usdoj.gov

Attorney for Plaintiff